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15 Attorneys for Plaintiff
UNITED STATES OF AMERICA

16 UNITED STATES DISTRICT COURT
17 FOR THE CENTRAL DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA,
19 Plaintiff,
20
21 v.
22 JOSEPH NEAL SANBERG,
23 Defendant.

No. 2:25-cr-00200 (A) -SVW

[PROPOSED] ORDER AUTHORIZING
ALTERNATIVE VICTIM NOTIFICATION
UNDER 18 U.S.C. § 3771(d) (2)

24 Pursuant to 18 U.S.C. § 3771, the United States of America
25 seeks an order pursuant to 18 U.S.C. § 3771(d) (2) authorizing it to
26 provide notice by publication to the large number of crime victims
27 in this case. Under Section 3771(a) (2), crime victims have a right
28

1 to "reasonable, accurate, and timely notice" of public court
2 proceedings, including change of plea and sentencing hearings, the
3 right to be "informed in a timely manner of any plea bargain," and
4 the right to "confer with the attorney for the Government in the
5 case."

6
7 In this case, the number of potential victims of the conduct
8 alleged in the First Superseding Information exceeds 250 investors
9 and lenders, and is expected to include additional investors and
10 lenders who have yet to be identified, some of whom pooled
11 investments through persons or entities about which there is no
12 public information, or invested directly in Company A. It will thus
13 be impracticable for the Government to identify and locate all
14 victims and individually provide them with reasonable, accurate, and
15 timely notice of this case and any future proceedings, including any
16 change of plea and sentencing hearings.

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18 Under such circumstances, 18 U.S.C. § 3771(d)(2) gives the
19 Court the authority to "fashion a reasonable procedure to give
20 effect to this chapter that does not unduly complicate or prolong
21 the proceedings." The Government seeks authorization to provide
22 notice to the potential victims by publication on the United States
23 Department of Justice's website, in addition to direct notice to
24 identified victims for whom the Government has contact information.


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26 The Court finds (1) that the "multiple victim" provisions of
27 18 U.S.C. § 3771(d)(2) apply to the above-captioned case; (2) that
28 it is impractical for the Government to identify and notify all the

1 direct and proximate victims of the charged offenses on an
2 individual basis at this time without unduly complicating or
3 delaying this matter; and (3) notice by publication is a "reasonable
4 procedure" to give effect to the provisions of 18 U.S.C. § 3771.
5 Accordingly, it is ordered that the United State is authorized to
6 comply with 18 U.S.C. § 3771(a)(2) by providing notice to potential
7 victims by publication.
8

9 IT IS SO ORDERED.

10
11 August 28, 2025

12 DATE



13 HON. STEPHEN V. WILSON
14 UNITED STATES DISTRICT JUDGE

15 Presented by:

16 /s/

17 Theodore Kneller
18 Trial Attorney, Fraud Section
19 Criminal Division
20 U.S. Department of Justice
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